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June 18, 2008

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
Washington DC 20554

RE: *Ex Parte* Presentations
WC Docket No. 07-245

Dear Ms. Dortch:

This is to inform you of three *ex parte* presentations that were made on June 18, 2008.

The first was made to the staff of the Enforcement Bureau, including Kris Monteith, Michael Carowitz, Lisa Saks and Suzanne Tetreault.

The second was made to Wayne Leighton, in the Office of Commissioner Tate.

The third was made to Amy Bender in the Office of Chairman Martin.

The presentations were made by Scott Liebel, Manager, Joint Use Assets, Ameren Services Company and Julius M. Griles, Manager, Delivery Design, Dominion Virginia Power. They were accompanied by undersigned counsel. Charles Zdebski of our firm also participated in the meeting with the Enforcement Bureau.

The presentations emphasized points made in the joint comments and reply comments filed in this proceeding by these electric utilities, as summarized on the attachment.

Very truly yours,



Raymond A. Kowalski

Attachment

WC Docket No. 07-245
Pole Attachments

“Stay the Course”

A Presentation by
Ameren Services Company (“Ameren”) and
Virginia Electric and Power Company (“Dominion Virginia Power”)

- Utility poles are critical infrastructure that supports the physical plant of America’s vital utilities, including electric service, telephone service, Internet service and video service.
- The Commission is on the right track in seeking to assure the safety of workers and the public, to safeguard the reliability of the infrastructure to assure the uninterrupted provision or prompt restoration of the services it supports, and to allocate a fair share of the cost of the infrastructure to those who use it.
- In comments, Ameren and Dominion Virginia Power have proposed a new way to look at the relationships between the providers of these services: an “infrastructure partnership.”
 - Replace the “surplus space” view;
 - Share the costs in a meaningful way;
 - Minimize disputes and complaints;
 - The federally-granted right of access comes with commensurate infrastructure stewardship obligations.
- Commission data support a presumption that all attachments are used to offer high speed broadband Internet access.
 - The Commission has legal authority to develop a third rental rate formula for broadband attachments that would apply to virtually all attachments.
 - Ameren and Dominion Virginia Power have proposed a formula that is based on space typically used by each type of service provider.

Presented by:

Scott Liebel, Manager, Joint Use Assets, Ameren Services Company

Julius M. (“Jay”) Griles, Manager, Delivery Design, Dominion Virginia Power

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